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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ORDER  
SETTING FURTHER HEARING ON  
MOTION TO STRIKE ASSERTED  
TRADE SECRET NUMBER 96 AND  
SUPPLEMENT THERETO (DKT. NOS.  
1408 AND 1416)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under  
7 Seal Portions of Order Setting Further Hearing on Motion to Strike Asserted Trade Secret Number 96  
8 ("Court's Order") and Supplement Thereto ("Court's Supplement"), filed concurrently herewith (the  
9 "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials  
10 filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Court's Order (Dkt. 1408)	Highlighted Portions	Waymo (green highlighting)
Court's Supplement (Dkt. 1416)	Highlighted Portions	Waymo (green highlighting)

15 3. Specifically, the Court's Order and the Court's Supplement (portions highlighted in  
16 green) contain or refer to trade secret information, which Waymo seeks to seal.

17 4. The green highlighted portions of the Court's Order (Dkt. 1408) and the Court's  
18 Supplement (Dkt. 1416), read in context of the entirety of the Court's Order and the Court's  
19 Supplement, have a high likelihood of tending to reveal Waymo's trade secrets. Waymo thus seeks to  
20 redact those portions to safeguard its trade secret information. The information Waymo seeks to  
21 safeguard by sealing those portions includes the confidential design and functionality of Waymo's  
22 proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as  
23 secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that  
24 the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this  
25 information would give Waymo's competitors access to descriptions of the functionality or features of  
26 Waymo's autonomous vehicle system. If such information were made public, I understand that  
27 Waymo's competitive standing would be significantly harmed.  
28

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on August 31, 2017.

Felipe Corredor  
Attorneys for WAYMO LLC

### SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

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Charles K. Verhoeven